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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

Richard Stanhope	:	
	:	
Plaintiff,	:	C.A. No. 1:16-cv-02040-NLH-AMD
	:	
v.	:	PLAINTIFF'S NOTICE OF MOTION
	:	FOR DEFAULT JUDGMENT
	:	AGAINST DEFENDANTS
Bank of America, N.A., Deborah Carter	:	DEBORAH CARTER FRAKE AND
Frake, Harry Frake, III, John and Jane Doe	:	HARRY FRAKE III
1-5, AND ABC Corps, 1-5.	:	
	:	Hearing Date: July 5, 2016
	:	
Defendants.	:	
	:	

PLEASE TAKE NOTICE that on **July 5, 2016, at 9:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Richard Stanhope, will make application before the Honorable Joel Schneider, U.S.M.J., Courtroom 3C, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ

08101, or such other judge as may be assigned, for an Order granting default judgment against Defendants Deborah Carter Frake and Harry Frake in the above captioned matter. Plaintiff's motion is made pursuant to Federal Rule of Civil Procedure 55(b) and other grounds set forth in the annexed brief.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the annexed brief and Certification of Richard Stanhope, with exhibits in support of this motion.

PLEASE TAKE FURTHER NOTICE that oral argument is waived.

THE KIM LAW FIRM, LLC

By: /s/ Richard H. Kim
Richard H. Kim, Esquire
Lisa A. Buckalew, Esquire
Co-Counsel for Plaintiff

Daniel M. Rosenberg, Esquire
Daniel M. Rosenberg & Associates, LLC
Co-Counsel for Plaintiff

Dated: May 31, 2016

**DANIEL M. ROSENBERG &
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

Richard Stanhope

Plaintiff,

v.

Bank of America, N.A., Deborah Carter
Frake, Harry Frake, III, John and Jane Doe
1-5, AND ABC Corps, 1-5.

Defendants.

:
:
: C.A. No. 1:16-cv-02040-NLH-AMD
:
:
: **ORDER GRANTING PLAINTIFF'S**
: **MOTION FOR DEFAULT JUDGMENT**
: **AGAINST DEFENDANTS**
: **DEBORAH CARTER FRAKE AND**
: **HARRY FRAKE, III**
:
:
:

THIS MATTER coming before the Court upon Plaintiff Richard Stanhope's Motion for Default Judgment against Defendants Deborah Carter Frake and Harry Frake III, and the Court having reviewed the moving papers, and any opposition thereto, and for good cause having been shown:

IT IS on this ____ day of _____, 2016, **ORDERED** that:

1. Plaintiff's Motion for Default Judgment against Defendants Deborah Carter Frake and Harry Frake III is hereby granted.
2. Judgment is hereby entered in the amount of \$_____ in favor of Plaintiff Richard Stanhope and jointly and severally against Defendants Deborah Carter Frake and Harry Frake III.
3. A true copy of this Order shall be served by Plaintiff upon Defendants Deborah Carter Frake and Harry Frake III within seven days of the date of receipt of this Order.

_____ opposed

_____ unopposed

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

Richard Stanhope	:	
	:	
Plaintiff,	:	C.A. No. 1:16-cv-02040-NLH-AMD
	:	
v.	:	CERTIFICATION OF PLAINTIFF'S
	:	COUNSEL IN SUPPORT OF MOTION
Bank of America, N.A., Deborah Carter	:	FOR DEFAULT JUDGMENT
Frake, Harry Frake, III, John and Jane Doe	:	
1-5, AND ABC Corps, 1-5.	:	
	:	
Defendants.	:	
	:	

I, Richard Kim, of full age, certify the following:

1. I am an attorney at law admitted to practice in the State of New Jersey, and principal of The Kim Law Firm, LLC, counsel for Plaintiff Richard Stanhope in the above captioned matter. I am making this certification in support of Plaintiff's Motion

for Default Judgment against Defendants Deborah Carter Frake and Harry Frake, III (collectively, the “Frakes”).

2. Attached hereto as **Exhibit “1”** is a copy of Plaintiff’s Application for the Entry of Default Against the Frakes filed on April 29, 2016, without exhibits.

3. Attached hereto as **Exhibit “2”** is a copy of the docket in the above-captioned matter, reflecting that default was entered against the Frakes on May 2, 2016.

4. Attached hereto as **Exhibit “3”** is a copy of the Verified Third Amended Complaint filed in this action in the Superior Court of New Jersey, Burlington County, under docket number C-110-14.

5. Attached hereto as **Exhibit “4”** are copies of Plaintiff’s Bank of America, N.A. checking account statements between October 19, 2012 through December 17, 2013 (Plaintiff’s account number has been redacted for security and in compliance with e-filing requirements).

I certify that the foregoing statements made by me are true to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

THE KIM LAW FIRM, LLC

Dated: May 31, 2016

/s/ Richard H. Kim
By: Richard H. Kim, Esquire